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October 19, 2020

Via ECF

Honorable Joseph A. Dickson, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Kimberlee Williams, et al. v. BASF Catalysts LLC, et al.*
Civil Action No. 2:11-cv-01754 (JLL) (JAD)

Dear Judge Dickson:

Pursuant to the schedule set forth in the Order Preliminarily Approving the Settlement, Plaintiffs' Petition for Approval of Counsel Fees, Reimbursement of Expenses, and Awards for the Class Representatives is due today. Out of a courtesy to opposing counsel, we shared our motion with Defense Counsel on Thursday last week for comment. I learned this morning that our email was lost to follow up by BASF's Counsel. I am advised that we will not receive comments we might incorporate for filing today. For that reason, with BASF's counsel's consent and agreement, I write to ask for a one-day extension for the filing of Plaintiffs' motion.

I've spoken with counsel for Cahill who consents to this request as well. We anticipate filing the Petition on October 20, 2020.

Respectfully,

/s/ HARRY M. ROTH

CHRISTOPHER M. PLACITELLA
HARRY M. ROTH
Counsel for Plaintiffs

So Ordered

/s/ Joseph A. Dickson
Hon. Joseph A. Dickson, U.S.M.J.

Dated: October 20, 2020